To: Albright, David[Albright.David@epa.gov]

Cc: Li, Corine[Li.Corine@epa.gov]

From: Montgomery, Michael Sent: Thur 8/6/2015 6:16:39 PM

Subject: RE: Call with Region 9 (CA UIC/Tribal DW)

Thanks David/Corine -

While you were out I spoke with Peter about Tribal drought (there was a bit of a mix up between admin folks on scheduling and he ended up calling me). We may want to give him a quick rundown on CNMI Typhoon and any heads up on the CNMI Marine NEPA before the call with Ken K. I will send around a note on the call I had. No need to follow-up, we can make adjustments on the call. Maybe we can just do the CNMI bit at the beginning (5-10 minutes) then all UIC from there.

mike

From: Albright, David

Sent: Thursday, August 06, 2015 10:59 AM

To: Grevatt, Peter

Cc: Mason, Paula; Montgomery, Michael; Dermer, Michele; McWhirter, Lisa; Engelman,

Alexa; Moffatt, Brett; Li, Corine

Subject: Call with Region 9 (CA UIC/Tribal DW)

Hi Peter,

For our call tomorrow (scheduled 9am-10am PDT), Mike asked that I forward the outline below regarding the CA Class II UIC program. We can also update you on tribal drought issues. Thanks, David

CA UIC Program

- * July 15th State Submittal
 - Preliminary assessment of 11 aquifers (HTAE)
- 1) 1 of the 11 may not be USDW; most or all of the others may not meet AE criteria

- 2) 5 of the 11 have no active injection
- 3) State expects at least 1 operator in the 11 to come forward with data/AE request
- No requests for AEs for disposal wells injecting into sub-3,000 ppm TDs aquifers (7/15/15 target date for state submittal)
 - 1) Disposal wells into sub-3,000 aguifers required to shut down 10/15/15
- 2) State is reviewing one package; likely public notice starting in August (Arroyo Grande)
 - Proposed plan and schedule for comprehensive Class II program improvements
 - Outline of proposed public participation in State's AE process
 - EPA reply letter
- 1) Timing of final determinations by state of 11 aquifers HTAE (11/15/15 target)
- 2) With no AE submittals, all Cat 1 wells in sub-3,000 aquifers (~50-60??) will cease injection by 10/15/15 per state's regulations
- * July 31st State Submittal
 - Initial review of 5,675 Category 2 wells (EOR wells)
 - 1) EOR well breakdown (85% cyclic steam; 12% steam flood; 3% other)
 - 2) For thermal enhanced recovery wells (97% of Cat 2) no further analysis
- 3) 24 Cat 2 wells still under review; State may/will issue information orders and take action as needed
 - 4) EPA response to July 31st submittal
- * Other Key Items
 - State's emergency/permanent regulations
 - Category 1 well evaluations
 - Class I injection wells

- Congressional and 3rd party interests/calls

- Contract support available for EPA review of CA AEs

- Upcoming dates/milestones

August 21, 2015: EPA/SB meeting on Class I wells

October 15, 2015: Shut-in of Cat 1 wells in sub-3,000 ppm TDS

aquifers if no AE

November 15, 2015: Target for 90% of Cat 1 AE requests, 100% of

determinations for the 11 aquifers HTAE

February 15, 2016: Target for 90% of Cat 2 AE requests

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